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*A Public Agency Serving the
Greater Escondido Valley Since 1954*

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October 31, 2013

Peter Brostrom
California Department of Water Resources
Water Use and Efficiency Branch
PO Box 942836
Sacramento, CA 94236

Re: DWR Independent Technical Panel – 2015 UWMP Reporting Requirements and Demand Management Measures Revision

Dear Mr. Brostrom,

The Rincon del Diablo Municipal Water District (Rincon) is located in the northeasterly inland portion of the County of San Diego (County). The District's service area encompasses approximately 42 square miles that overlaps portions of the cities of Escondido, San Marcos, San Diego, and various unincorporated areas of the County. Through its two water improvement districts (ID 1 and ID A), the District maintains and operates approximately 132 miles of water main, six pump stations, and ten reservoirs serving approximately 8000 water service connections and a population of 29,500 residents. It also provides recycled water to portions of the improvement districts and plans to increase the use/delivery of recycled water. In addition, the District provides fire services through the Escondido Valley Fire Department.

Rincon was recently informed that an Independent Technical Panel (ITP) is currently reviewing and working to propose additional reporting requirements and demand management measures associated with the 2015 Urban Water Management Plans (UWMP). Rincon in principle does not object to revising the UWMP requirements, but many of the draft changes being proposed include unnecessary and burdensome reporting requirements that are outside the purview of the ITP purpose and UWMP process. Especially considering SBX 77 has been enacted and many retail agencies are meeting the specific requirements of the legislation.

Rincon requests that the DWR revisit and reconsider the proposed changes, with either voting down or altering the proposed changes in line with below concerns/comments:

1. **Electronic Filing.** Rincon is in agreement with electronic filing and transparency of the UWMPs, since we currently provide our UWMP to our customers. Rincon additionally agrees that standardization of forms and tables levels the playing field for all agencies and reporting comparisons. However, Rincon does not agree that the DWR should review and approve every UWMP submitted, as they do not have the time or resources to accomplish this requirement. Rincon does not agree that an agency needs to provide and file its' UWMP with everyone in the area, but post on its' own website for others to obtain. This ITP proposed recommendation should either be completely withdrawn or rewritten to minimize the requirements.
2. **Demand Management Measures.** Rincon is in concurrence with reducing the current list of DMMs from 14 to 7 and with DWR providing additional guidance and tools to assist agencies in meeting requirements. As noted above, many agencies are already meeting or have plans to meet

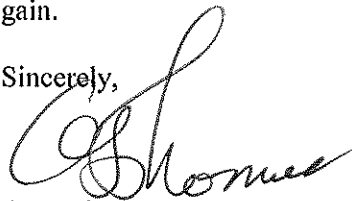
SBX 7 7, thus providing additional tools to assist those who may need them and removing onerous reporting requirements is in concert with SBX 7 7 and established regulations. Including optional DMMs will encourage conservation approaches.

3. **Avoided Cost, Additional Standards and Codes, and Water Energy Intensity.** These three proposed changes together (and individually) add unnecessary levels of effort and costs to already over-taxed water agencies and are outside the UWMP process. As noted, tools are already provided to agencies to assist them with cost estimating conservation, and these are used. Agencies continue to pursue conservation, energy use reduction, water loss prevention, and other measures in order to lower the cost of water to the customer and be more efficient as organizations. Our highest priority is providing the highest water quality and most reliable supply to our customer. This is on top of decreased water sales and revenue due to depressed economy as well as direct agency initiatives already being executed, such as conservation, increased use of recycled for irrigation/industrial, and community outreach and education. Adding reporting criteria for standards and codes and imbedded energy would place an extremely undue burden on all agencies, and specifically for energy, outside the purpose of the UWMP. Rincon has read the recent ITP Straw Proposal #3 v.3b (10/30/13) and agrees that there be optional DMMs related to water-energy efficiency partnerships.
4. **Landscape Ordinance.** Requiring water agencies to consolidate and include landscape ordinances into their UWMP is completely unnecessary and would be extremely time consuming and costly for the agency. This requirement is best suited to the landscaping and irrigation related industries. Rincon did read the most recently posted ITP Straw Proposal #7 v.2b (10/30/13) and is in concurrence with this language. Rincon does not agree with ITP Straw Proposal #7 v.2a (10/28/13), as this is similar to the other proposed change and places unnecessary requirements on a water agency.

I commend DWR for sponsoring the ITP and discussing new demand management measures, technologies, and approaches. Unfortunately, majority of the proposed changes are outside the purpose of the UWMP and seem to ignore the requirements of SBX 7 7. The goal of the ITP should look at how DWR and the UWMP process assists those agencies who have trouble meeting SBX 7 7 and not penalize those agencies already meeting or on track to meet the 20x2020 goals and requirements.

With SBX 7 7 and the recent trend of providing more tools to meet these goals, Rincon believes the ITP should reject the proposed 2015 UWMP reporting changes. In many cases, less is more, and the proposed changes are not fiscally prudent and unnecessarily increase the burden on agencies and DWR with no real gain.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Thomas", written over the word "Sincerely,".

Greg Thomas
General Manager